



November 16, 2017

Re: Brownfields Grant Application – Fiscal Year 2018  
Central Business District Redevelopment Plan  
Community-Wide Assessment Grant  
Hazardous Substances and Petroleum Products

The City of Douglas (City), Arizona covers an area of about 10 square miles, located in the southeast portion of Arizona along the U.S.-Mexico international border, and 118 miles southeast of Tucson, Arizona. Douglas was founded in 1905, and was established as a major copper smelter community for copper mines in southeast Arizona. International commerce is an important part of the local economy, along with ranching and agriculture. Spanish Conquistadores established presidios throughout the region dating back to the late 1700's. Douglas and across the border sister-city, Agua Prieta, Mexico is considered a megaregion, recognizing the fluidity of border economies and the importance of ensuring seamless cross-border economic activity.

Douglas has a population of approximately 16,604, located in Cochise County where an average of 38.3% have persistently lived below the poverty level over the past 30 years. Douglas is 82% minority who speak a language other than English at home. The City continues to struggle with low median household incomes (\$27,975), high unemployment (8.4%) and poverty rate of 32.0%. Environmental Justice is a concern in low-income, minority and otherwise disadvantaged populations, which bear a disproportionately high burden of environmental pollution.

Douglas is a gateway into the Arizona economy that has become a conduit for billions of dollars of U.S. trade with Mexico. The City is heavily dependent on consumers from Mexico who travel to Arizona at a rate of 3,100 pedestrians per day, and cross the border for retail shopping, education, and health services. Mexico is expected to surpass Brazil as the largest economy in Latin America by 2020, and predicted to become the 7<sup>th</sup> largest global economy. More than 100,000 engineers from Mexico graduate every year, and is 64% of the Economic Active Population (EAP) of the total Mexican population. Upon graduating many engineers seek higher paying jobs with U.S. companies. Establishing a stronger economy through redevelopment in Douglas will provide the needed jobs to recruit young engineers from Mexico, and improve the retention of local college students graduating from Cochise College and the University of Arizona.

The City has assembled an inventory of Brownfields properties as part of their redevelopment plan for the Downtown Business District, and will include the eventual annexation of an additional 7,000 acres as part of the U.S. Customs and Border Patrol plans to construct a new Commercial Port of Entry. The downtown area identified 42 properties that are considered Brownfields sites, which accounts for 960 acres (30%) of the total 5 square mile targeted area. Of the 960 total acres in the City, 43% are underutilized or vacant properties zoned as retail,



commercial and light industrial. Within the heart of the Downtown Business District there are 16 vacant Brownfields properties that require environmental assessments for redevelopment.

The Arizona-Mexico binational border region is positioned for international business growth. Douglas will continue to become a viable megaregion for new businesses along the international border region. City officials, businesses, and community leaders are collaboratively updating a strategic plan that is perceptibly aligned with the new vision of the community by focusing on areas impacted by Brownfields sites. The City has recruited active public participation and have formed a strong consensus for economic development and job creation. The community's rich history in culture, economic drivers, community assets, and strategic border location make Douglas the ideal location for business investment. The City's commitment to construct border and business district infrastructure improvements is aligned with the fluidity of border economies and advances in technology and border security. This focus will stimulate economic growth while establishing Douglas as a major gateway for international commerce.

**a. Applicant Identification**

City of Douglas, Arizona

**b. Funding Requested:**

i. Grant Type: Assessment

ii. Assessment Grant Type: Community-wide

iii. Federal Funds Requested: Community-wide Funds  
\$112,200 (Petroleum), \$187,800 (Hazardous Substances)

iv. Contaminant: Both Petroleum Products and Hazardous Substances

**c. Location:**

Douglas, Cochise County, Arizona

**d. Property Name and Address**

Downtown Business District and Community-Wide

**e. Contacts:**

i. Project Director:

David Carranza

425 E. 10<sup>th</sup> Street

Douglas, Arizona 85607

Telephone: (520) 417-7307

Facsimile: (520) 417-7143

Email: [David.Carranza@douglasaz.gov](mailto:David.Carranza@douglasaz.gov)

ii. Highest Ranking Elected Official:

Honorable Robert Uribe, Mayor

425 E. 10<sup>th</sup> Street

Douglas, Arizona 85607

Telephone: (520) 417-7334

Facsimile: (520) 417-7143

E-mail: [Robert.Uribe@douglasaz.gov](mailto:Robert.Uribe@douglasaz.gov)

**f. Population**

City: 16,604

(2010 Census Population Estimate)

**g. Regional Priorities Form/Other Factors Checklist**

See Appendix 3 attached

**h. Letter from the State or Tribal Environmental Authority**

Not Applicable



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### APPENDIX 3 - REGIONAL PRIORITIES FORM/OTHER FACTORS CHECKLIST

Name of Applicant: City of Douglas, Arizona

#### Regional Priorities Other Factor

If your proposed Brownfields Assessment project will advance the regional priority(ies) identified in Section I.F., please indicate the regional priority(ies) and the page number(s) for where the information can be found within your 15-page narrative. Only address the priority(ies) for the region in which your project is located. EPA will verify these disclosures prior to selection and may consider this information during the selection process. If this information is not clearly discussed in your narrative proposal, it will not be considered during the selection process.

Regional Priority Title(s): Leveraging New/Expanded Transit Investments to Reduce Air Pollution

Page Number(s): 3-4

#### Assessment Other Factors Checklist

Please identify (with an X) which, if any of the below items apply to your community or your project as described in your proposal. To be considered for an Other Factor, you must include the page number where each applicable factor is discussed in your proposal. EPA will verify these disclosures prior to selection and may consider this information during the selection process. If this information is not clearly discussed in your narrative proposal or in any other attachments, it will not be considered during the selection process.

#### Other Factors Checklist

Other Factor	Page No.
<i>None of the Other Factors are applicable</i>	
Community population is 10,000 or less.	
The jurisdiction is located within, or includes, a county experiencing “persistent poverty” where 20% or more of its population has lived in poverty over the past 30 years, as measured by 1990 and 2000 decennial censuses and the most recent Small Area Income and Poverty Estimates.	<b>X</b> <b>(P. 3 &amp; 4)</b>
Applicant is, or will assist, a federally recognized Indian tribe or United States territory.	



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Target brownfield sites are impacted by mine-scarred lands.	
Project is primarily focusing on Phase II assessments.	
Applicant demonstrates firm leveraging commitments for facilitating brownfield project completion, by identifying in the proposal the amounts and contributors of resources and including documentation that ties directly to the project.	<b>X (P. 10)</b>
Applicant is a recipient of an EPA Brownfields Area-Wide Planning grant.	

### Other Factors Checklist

Other Factor	Page #
<i>None of the Other Factors are applicable.</i>	
Community population is 10,000 or less.	
The jurisdiction is located within, or includes, a county experiencing “persistent poverty” where 20% or more of its population has lived in poverty over the past 30 years, as measured by the 1990 and 2000 decennial censuses and the most recent Small Area Income and Poverty Estimates.	
Applicant is, or will assist, a federally recognized Indian tribe or United States territory.	
Target brownfield sites are impacted by mine-scarred land.	
Project is primarily focusing on Phase II Assessments.	
Applicant demonstrates firm leveraging commitments for facilitating brownfield project completion, by identifying in the proposal the amounts and contributors of resources and including documentation that ties directly to the project.	
Applicant is a recipient of an EPA Brownfields Area-Wide Planning grant.	



Douglas A. Ducey  
Governor

# ARIZONA DEPARTMENT OF ENVIRONMENTAL QUALITY



Misael Cabrera  
Director

*Via U.S. Mail and email*

November 3, 2017

VRP18-086

Mr. Jim Russell, City Manager  
City of Douglas  
425 E. 10<sup>th</sup> Street  
Douglas, Arizona 85607

Re: Brownfields Community-Wide Assessment Grant for the City of Douglas

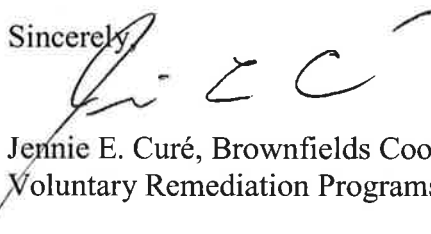
Dear Mr. Russell,

The Arizona Department of Environmental Quality (ADEQ) Brownfields Program is pleased to provide a letter in support of the City of Douglas's application to the Environmental Protection Agency (EPA) for a FY 2018 Brownfields Community-Wide Assessment Grant.

ADEQ believes that the FY 2018 Brownfields Community-Wide Assessment Grant will be a good use of funding as the City of Douglas is planning redevelopment of the downtown business district and the corridor proposed for a Commercial Port of Entry along the U.S.-Mexico border. The City of Douglas has been recognized by the State of Arizona as a new metropolitan area that is projected to capitalize on the growing commercial and pedestrian traffic from Mexico. Mexico's economy has been focused on industry which is expected to surpass Brazil as the No. 1 economy in Latin America. Douglas is in position to benefit from this opportunity and is working on a viable development plan to stimulate growth in the Douglas economy.

ADEQ fully supports the City of Douglas and stakeholders with the important Brownfields projects and we look forward to providing the communities and stakeholders with additional services and funding opportunities.

Sincerely,

  
Jennie E. Curé, Brownfields Coordinator  
Voluntary Remediation Programs Unit Waste Program Division

## **1. COMMUNITY NEED**

### **A. TARGET AREA AND BROWNFIELDS**

#### **i. Community and Targeted Area Description**

The City of Douglas (City) is in the southeast portion of Arizona, along the U.S.-Mexico border. Douglas is situated in the Sonoran Desert, is the 34<sup>th</sup> largest city in Arizona with a population of 17,504 in 2016.<sup>1</sup>, and is the second largest city in Cochise County. Douglas is 118 miles southeast of Tucson and 232 miles southeast of Phoenix. Douglas was founded in 1905, and was established as major copper smelter community for copper mines in southeast Arizona. International commerce is an important part of the local economy, along with ranching and agriculture. Spanish Conquistadores established presidios throughout the region dating back to the late 1700's. The City's rich cultural heritage is anchored in a unique blend of Native American, Spanish, Mexican, and Anglo-American influences. Douglas continues to play a vital role as a gateway to Mexico and Rio Sonora Region and shares a rich, cultural and economic history with its Mexican sister city Aqua Pierta. 2012.<sup>2</sup>

Douglas has been left with properties that were impacted by contaminants from the copper smelting and mining operations. Buildings in the project area that are in disrepair with poor weatherization and proper ventilation systems have been impacted greatly by airborne contaminants from copper smelting operations. For several decades high concentrations of copper and other metals persist in the Douglas area, and are carried via wind-blown air particles, which ultimately settle on buildings. Conflated with a stagnant economy, several buildings remain vacant because of the liability and health risks associated with asbestos, lead, arsenic, and cadmium that is prevalent in buildings throughout Douglas. Although, the smelter operations ceased in the 1980's, chronic illnesses still persist from heavy metals that are prevalent throughout the community. Several businesses such as gas stations, auto repair and transmission shops, metal fabrication, and light industrial manufacturers closed after the Great Recession in 2009, and were left in poor condition. Abandoned buildings have led to vandalism and increased crime activity.

The Douglas Port of Entry (POE) has been in existence since 1914. The current border inspection facility was built in 1933 and is not designed to have the current traffic volume. As a result, thousands of vehicles and trucks sit idling every day for hours to get through border inspections at the outdated POE. Douglas has recognized the dire need to stimulate economic development in the Central Business District, which has experienced a major decline in popularity for redevelopment and economic stability because of more appealing retail outlets and lost interest to reinvest in the Central Business District.

Douglas has a total of 500 businesses, several that lack investment dollars in the downtown area because of potentially contaminated properties, deteriorating infrastructure, vacant buildings, and older housing stock. Approximately twenty buildings in the Central Business District are in disrepair, underutilized, and have health and safety risks associated with environmental impacts from asbestos and lead-based paint.

This grant will focus on the City's Central Business District (Project Area), which covers approximately 2.5 square miles, including downtown Douglas, historic and cultural districts. the



City has started working towards the revitalization of downtown, and proposed initiatives for private development projects are currently in the planning stage.

## ii. Demographic Information and Indicators of Need

	Targeted Community	City	Statewide	National
<b>Population</b>	8,163 <sup>vi</sup>	16,604 <sup>v</sup>	6,392,017 <sup>i</sup>	308,745,538 <sup>i</sup>
<b>Unemployment</b>	11.3% <sup>iv</sup>	8.4% <sup>ii</sup>	8.2% <sup>ii</sup>	7.2% <sup>ii</sup>
<b>Poverty Rate</b>	32.0% <sup>iv</sup>	32.0% <sup>v</sup>	16.2% <sup>iv</sup>	15.1% <sup>iii</sup>
<b>Percent Minority</b>	78.2% <sup>iv</sup>	86.0% <sup>v</sup>	21.3% <sup>iv</sup>	26.7% <sup>i</sup>
<b>Median Household Income</b>	\$31,073 <sup>iv</sup>	\$27,975 <sup>v</sup>	\$50,255 <sup>iv</sup>	\$53,889 <sup>iii</sup>

<sup>i</sup>Data from the 2011 U.S. Census data and is available at <http://www.census.gov/>.

<sup>ii</sup>Data from the Bureau of Labor Statistics, available at [www.bls.gov](http://www.bls.gov)

<sup>iii</sup>Data from the 2011 ACS and is available at [http://www.census.gov/newsroom/releases/archives/income\\_wealth/cb11-157.html](http://www.census.gov/newsroom/releases/archives/income_wealth/cb11-157.html)

<sup>iv</sup>Data from the U.S. Census Bureau, 2011-2015 ACS 5-Year Estimates, available at [https://factfinder.census.gov/faces/nav/jsf/pages/community\\_facts.xhtml](https://factfinder.census.gov/faces/nav/jsf/pages/community_facts.xhtml)

<sup>v</sup>Data from the U.S. Census Bureau: State and County Quick Facts, Douglas, Arizona, available [https://factfinder.census.gov/faces/tableservices/jsf/pages/productview.xhtml?pid=ACS\\_11\\_5YR\\_DP03](https://factfinder.census.gov/faces/tableservices/jsf/pages/productview.xhtml?pid=ACS_11_5YR_DP03)

<sup>vi</sup>Data from the City of Douglas, Findings of Conditions Leading to Arrested Growth in the Proposed Downtown/Gateway Redevelopment Area Report, found at [cms3.Douglasaz.gov/business/cbd](http://cms3.Douglasaz.gov/business/cbd).

## iii. Description of Brownfields

The City is seeking EPA Community-wide Assessment funding to characterize the environmental contamination of former industrial and commercial properties within the Project Area. The Central Business District of Douglas has an estimated 35 Brownfields impacted sites, of which approximately 25% are located within the downtown corridor. These sites include warehouses, former gas stations, dry cleaners, automotive repair facilities, abandoned industrial and manufacturing facilities, railroad lines and spurs, and vacant/abandoned inner city structures and businesses. On average commercial structures within the redevelopment areas were built before 1967, with no structure being built later than 1978.<sup>3</sup>

An abandoned gas station at 999 F Avenue is in the heart of Douglas, which has underground storage tanks that have not been properly assessed and closed. It is likely that this property and existing structure, built prior to 1967, has asbestos containing materials and lead-based paint. The dilapidated gas station has 2 service bays could have used chlorinated solvents, and other petroleum products that were discharged into indoor drains. There is evidence of oil staining on concrete floors in the existing maintenance bay. There exists a perceived negative impact for this Brownfields site regarding the subsurface soils and/or groundwater beneath the abandoned gas station. It is unknown if the tanks have been leaking or contain free product.

According to the Arizona Department of Environmental Quality there are 43 identified leaking underground storage tanks (LUST) sites, and 24 hazardous materials incidents reported within the Project Area.<sup>4</sup> Environmental Site Assessments (ESAs) conducted on similar Brownfields sites have revealed petroleum contaminants and hazardous products such as volatile organic compounds (VOCs), semi-volatile organic compounds (SVOCs), polynuclear aromatic hydrocarbons (PAHs), polychlorinated biphenyls (PCBs), metals, and asbestos. These materials can be found in shallow soils, soil vapors, and groundwater pollution which are likely to be found at Brownfields sites throughout the Project Area. These contaminants give the perception of threats to the health and welfare of the citizens within the targeted community if exposed to contaminants through inhalation or ingestion pathways. Residents in the Project Area can also be exposed to poor indoor air quality through the vapor intrusion process.

## **B. WELFARE, ENVIRONMENTAL, AND PUBLIC HEALTH IMPACTS**

### **i. Welfare Impacts**

The Project area will advance the regional priorities through improved international border traffic flow, capital improvements for streets and wastewater expansion, and reduce threats to human health and the environment by improving air quality through transit investments aligned with transit-oriented redevelopment of Brownfields sites.

Residents who live in the Project area, and those who work downtown are exposed to airborne contaminants that persist in the downtown buildings. An estimated 51% of the targeted population are exposed to air toxins that cause cancer risks, and 79% of exposed to lead paint.<sup>5</sup> Douglas has an average of 38.3% who have persistently lived below the poverty level over the past 30 years.<sup>6</sup> Environmental Justice is a concern in low-income, minority and otherwise disadvantaged populations, which often bear a disproportionately high burden of environmental pollution.<sup>7</sup>

### **ii. Cumulative Environmental Issues**

While Brownfields sites have the potential to negatively affect the health and wellness of the targeted community, there are several other cumulative environmental issues within or directly adjacent to the downtown area, which also pose a threat. The Project Area has long served as a commercial and industrial center and today 30% (960 acres) of the land within the Central Business District has industrial uses. US Highway 191, a four-lane highway, runs directly through the Central Business District, and has a significant impact on air quality, primarily from international commercial traffic using the Douglas POE. Approximately 47% of the population are affected by Particulate Matter (PM 2.5).<sup>8</sup> Mobile sources account for 60% of the air pollution in Cochise County<sup>9</sup> and on average 49,607 vehicles per day travel on the portion of Arizona Highway 191 that runs through the Project Area.<sup>10</sup>

Based on the age of building stock, the City expects to find contaminants and hazardous products such as volatile organic compounds (VOCs), semi-volatile organic compounds (SVOCs), polynuclear aromatic hydrocarbons (PAHs), 1,4 Dioxane, polychlorinated biphenyls (PCBs), metals, and asbestos at Brownfields sites within the Project Area. Occupants of outdated commercial buildings are most at risk of exposure as well as residents living in the low-income

neighborhoods of downtown Douglas. These contaminants are known to be carcinogenic, and have harmful impacts on nervous, respiratory and organ systems in humans.

### **iii. Cumulative Public Health Impacts**

According to the Agency for Toxic Substances and Disease Registry, exposure to PAHs during pregnancy resulted in birth defects and abnormally low body weights in newborns. Heavy metals, such as lead, have also been shown to result in lower IQ levels and impaired neurological development in children. Long term exposure to 1,4 Dioxane has been shown to cause cancer as well as liver and kidney damage. People with weak or compromised immune systems, such as the elderly and infants, are likely to experience more severe health effects when exposed to the contaminants above. Occupants in commercial buildings that are exposed to indoor contaminants for an extended period are also at risk of chronic health effects. Douglas' Air Quality Index (AQI) average was 138 in 2013, significantly worse than the national AQI average of 75. Douglas ranks 17<sup>th</sup> for Particulate Matter (PM<sub>10</sub>), and 11<sup>th</sup> for highest ozone readings out of the Top 101 Counties (2012) in the US. The largest ethnic population in Douglas is Hispanic (82%), which has an obesity rate above 35%, greater than non-Hispanic whites (28.1%).<sup>11</sup>

The Cochise County Health Department recognizes rural communities and poverty health is influenced by biological, social, economic, and environmental factors and their interrelationships. People who live in rural areas are at a higher risk for poor health. The Rural Health Information Hub states "[R]ural risk factors for health disparities include geographic isolation, lower socio-economic status, higher rates of health risk behaviors, and limited job opportunities. Higher rates of chronic illness and poor overall health are found in rural communities when compared to urban populations."<sup>12</sup> This is further magnified by the fact that Douglas' population is 82% Hispanic, who are known to have a higher rate of obesity and diabetes than other ethnic groups, according to the Arizona Department of Health Services.<sup>13</sup> Respiratory illnesses such as asthma and cancer in the Douglas area have been linked to limited opportunities for physical activity for a rural community due to the lack of community parks, recreation and fitness centers, and pedestrian/bike paths.<sup>14</sup> The predominantly Hispanic population is also prone to other chronic diseases that reduces participation in many healthy activities.

## **C. FINANCIAL NEED**

### **i. Economic Conditions**

Douglas's economic recovery continues to struggle and ranks in the lower levels when comparing employment, unemployment, output, and housing prices with other cities in the Mountain region. Jobs in the area are predominantly limited to minimum wage. City and County government cannot afford to invest in capital improvement projects or redevelopment because the little tax revenue generated is barely enough to cover essential public services. College graduates have very few decent paying job opportunities, and often are forced to seek employment outside Douglas.

The unemployment rate in Douglas was 8.4% in 2016, compared to 5.2% in Arizona, and 4.9% in the US. In 2011, 32.0% of residents in Douglas lived in poverty, and Douglas's poverty rate was

the 2nd highest in southern Arizona when compared to other Arizona metropolitan areas.<sup>15</sup> Additionally, Douglas was ranked as the fourth fastest shrinking metropolitan statistical area in the U.S. While the state and national economy have improved, Douglas' economy has not fully recovered from the Great Recession in 2009.

The Douglas POE is the second largest commercial port in Arizona. A study assessing pedestrian traffic patterns between the U.S. and Mexico indicated in 2014, 64,000 commercial trucks were processed and close to \$4 billion worth in trade between the two countries. In 2015, the Douglas POE processed 2.84 million personal vehicle passengers, and 1.06 million pedestrians.<sup>16</sup> Unfortunately, Douglas has not been able to capture sustainable percentage of this traffic to help stimulate the local economy. Most of traffic travels north to larger cities in southern Arizona for shopping needs. Analysts have known for some time that Mexican visitors are a major economic driver for the state. Cochise County, where Douglas is located, ranked last out of the four border counties in terms of geographic distribution of economic impacts of Mexican visitation.

Shopping is the principal reason Mexican visitors cross the U.S.-Mexico border. Douglas lacks retail shopping opportunities that could draw a higher population of pedestrian traffic to support the local economy. In 2015, an estimated 1.14 million pedestrians crossed the border, an average of 3,100 pedestrians per day.<sup>17</sup> Mexican visitors searching for more variety in retailers are drawn away from Douglas. These factors have a significant impact on lost business opportunities, reduced tax base, and depressed property values, which increases the burden on municipal services, and demonstrates the potential Mexican visitors could have on the local economy. Revitalizing the Central Business District could be more appealing for new businesses to locate if current building stock downtown were cleared from environmental issues.

## **ii. Economic Effects of Brownfields**

Brownfields sites have had a negative economic effect within the Central Business District. The Economic Development Department operates on a budget of \$22,000 (FY17), which inhibits economic growth for the targeted area downtown. Vacancy of 16 commercial properties in the heart of downtown Douglas is a sign of tough economic times. The median household income of the targeted community is just 52% of the national average. Due to economic disinvestment, downtown Douglas is plagued with aging buildings and obsolete infrastructure, a prevalence of dilapidation and deterioration, and a lack of property maintenance. Large areas of blight have discouraged new businesses from locating into the Project Area, significantly reducing the number of jobs available. There are over 64 commercial properties vacant or undeveloped within the Project Area, which is roughly (320 acres). This has led to a reduction in both the property and sales tax base. Forty five percent of the City's revenue comes from property and sales taxes, and the reduction of both can have a significant economic effect on the City's budget. A loss in revenue also affects the City's ability to provide its citizens with vital municipal services, which is most damaging in low-income neighborhoods. Blight throughout the Project Area has also led to depressed property values and community disinvestment.

## **2. PROJECT DESCRIPTION AND FEASIBILITY OF SUCCESS**

### **A. PROJECT DESCRIPTION, REDEVELOPMENT STRATEGY, AND TIMING AND IMPLEMENTATION**

#### **i. Project Description and Alignment with Revitalization Plans**

This grant project will focus on establishing a safe community that integrates an economic gateway, international and regional transportation, and the preservation of historical and cultural aspects of Douglas. Assessing Brownfields properties in the Central Business District, and will complement the efforts by the City to help revitalize downtown Douglas. There are several ongoing regional initiatives that will stimulate economic activity in the downtown Douglas area.

Initiatives such as the Cochise County Enterprise Zone, is part of a statewide initiative which encourages non-retail businesses (less than 200 employees) locating within the Enterprise Zone may be eligible for income or premium tax credits, and small businesses (less than 100 employees) would be eligible for property tax benefits.<sup>18</sup>

The City is strengthening local businesses through assistance with planning and development strategies. One strategy is developing less restrictive zoning regulations and establish a Reuse Overlay Zone and District. Through a General Plan amendment, several zoning barriers lifted for multi-story, and multi-use buildings downtown. There is a strong need for the assessment of Brownfields sites in the downtown and proposed commercial POE corridors, which has renewed the interest of property owners and developers, grounded in the state designation that Douglas is part of a young metropolitan region. This funding will allow the City to assess Brownfields sites with high redevelopment potential aiding in the revitalization of downtown. A regional effort is underway through a CBP Feasibility Study for a new commercial POE which will study traffic patterns, air quality, noise pollution, and security. Continued investments will focus on a renewed understanding of a close link between infrastructure and economic development for border region. Border security is a high priority in the Douglas area where CBP is tasked with reducing the drug and illegal immigrant traffic. Residents who live along the border are in a high-risk zone where law enforcement from several agencies patrol the border.

The designation as the eastern corridor of the Canada-Mexico (CANAMEX) North American trade corridor offers an opportunity for Douglas to improve its role as a major gateway for International trade between the U.S. and Mexico. The Douglas POE accounts for nearly \$4 billion in trade annually and is considered a critical economic driver for Arizona and the US. As part of a 5-year infrastructure plan, a new state of the art commercial POE has been proposed to improve commercial traffic flow and border security in Douglas<sup>19</sup>. Regional transportation planning is underway to extend the international commercial corridor from a new commercial POE which will improve traffic flow, security and economic growth for the region.

#### **ii. Redevelopment Strategy**

The establishment of the Central Business District enabled the use of a Government Property Lease Excise Tax (GPLET), a redevelopment tool available for projects within the Central Business District. GPLET initiates development by reducing a project's operating costs through an eight-year property tax abatement. The City has deemed that vacant and underutilized

properties will be the primary focus of the use of GPLET, providing an incentive for redevelopment.

This grant project will focus on assessing Brownfields properties in the Central Business District. Site selection will primarily target the downtown business corridor and the proposed commercial POE project by the CBP, see section 2.A.iii below. The City will contract with an environmental consultant to begin community outreach with property owners and develop a GIS mapping and database to rank properties based on key attributes for prioritization. Once the property inventory is established, roundtable meetings will be conducted to gather feedback from property owners, and encourage participation in the Brownfields program. Realtors and brokers will be willing to list properties once they have been properly assessed and cleared of environmental impacts. Eliminating the perception of environmental liabilities will allow properties to be more appealing to developers.

### **iii. Timing and Implementation**

Douglas will initiate the Brownfields Program in Fall 2018. City staff will initiate the Procurement process within the first 8 weeks for contractor selection to assist with managing the Brownfields Program. The City will adhere to a competitive bid process to select a most qualified contractor. City will work closely with the selected firm to work with local and established community groups to develop a comprehensive Brownfields inventory. Stakeholders throughout the community will be contacted to assist with the selection criteria and prioritization of a Brownfields inventory list in the Spring 2018. Sites that are identified with highest priority will be vetted for assessment. Site assessments will begin after a property inventory list has been established within the first six months. The City will meet with prospective property owners to execute an Access Agreement, and schedule a time to conduct a site inquiry to assess if the property meets the criteria for Brownfields assessment work. Access agreements will be executed within 48-hours of owner approval to conduct an environmental site assessment.

## **B. TASK DESCRIPTION AND BUDGET TABLE**

### **i. Task Descriptions**

The primary tasks to be completed for petroleum and hazardous substance project tasks includes site inventories, Phase I Environmental Site Assessments (ESAs), Phase II ESAs, asbestos surveys, site cleanup plan development, and area-wide plans and community meetings.

The following is a list of outputs and outcomes that the City expects to accomplish during the three-year project period for this grant.

#### Outputs:

- Establish and prioritize a list of site inventories
- Conduct three community meetings or outreach events
- Submit complete and accurate project data via ACRES within ten-working days
- Prepare Community Involvement Plan
- Complete 20 Phase I ESAs (8 Petroleum Products and 12 Hazardous Substances)



- Complete 8 Phase II ESAs (3 Petroleum Products and 5 Hazardous Substances)
- Complete 6 asbestos surveys (Hazardous Substances)
- Update and maintain Brownfields Inventory system on GIS platform
- Prepare 5 ABCAs (2 Petroleum Products and 3 Hazardous Substances)
- Complete Health Monitoring Report

Outcomes:

- Increase City tax base by 2%
- Create 20 new jobs
- Redevelop 5 Brownfields properties (at least 3 acres)
- Attract new businesses or facilitate expansion of existing businesses (3 total)
- Create 1 greenspace project linked to cultural and historical districts

The City will prepare a Work Plan with defined, quantitative project goals, and schedule that will be included with the Cooperative Agreement with EPA. Project output, outcomes, and schedule will be tracked by the City on a quarterly basis and reported in Quarterly Reports to EPA.

**Task 1: Program Management** - Travel to national/regional conferences/workshops, training, and meetings with other Brownfields programs. Direct costs for programmatic and financial grant management (reporting and environmental oversight) provided as in-kind services by Douglas (estimated \$50,000).

Cost Basis (Petroleum Products) – Total: \$5,000

Travel: 1 person @ 2 conference/year (over 3 years) = \$5,000

Cost Basis (Hazardous Substances) – Total: \$5,000

Travel: 1 person @ 2 conference/year (over 3 years) = \$5,000

**Task 2: Public Engagement** - Actively promote community participation and input by meeting regularly with project stakeholders. Prepare Community Involvement Plan and outreach/promotional materials. Update website and conduct stakeholder meetings. Work with local non-profit organizations to engage community. In-kind personnel costs services - \$12,500.

Cost Basis (Petroleum Products) – Total: \$2,000

Supplies: Outreach materials (fliers, handouts) = \$1,400

Other – Advertising and Postage - \$600

Cost Basis (Hazardous Substances) – Total: \$2,400

Supplies: Outreach materials (fliers, handouts) = \$1,800

Other – Advertising and Postage - \$600

**Task 3: Health Monitoring** - Develop Health Monitoring Plan with CCHD. Collect health and environmental data, such as personal health and health habits; health care facilities; recreational, greenspace, and public space; transportation; and other data to be used to improve resident health and guide redevelopment planning. Work with local non-profit organizations to conduct health monitoring. In-kind personnel costs - estimated \$12,500.

Cost Basis (Hazardous Substances) – Total: \$7,000

Contractual: Health Monitoring Plan = \$7,000

Cost Basis (Hazardous Substances) – Total: \$7,000

Contractual: Health Monitoring Plan = \$7,000

**Task 4 – Inventory** - Contract with consultant to work with non-profit organizations to conduct Brownfields inventory. Update GIS-based inventory management system for target area. Prioritize properties for future assessment. In-kind personnel costs - estimated \$5,000.

Cost Basis (Petroleum Products) – Total: \$10,900

Personnel (Inventory Update): 160 hours @ \$15.00 per hour = \$2,400

Contractual: Brownfields Inventory = \$8,500

Cost Basis (Hazardous Substances) – Total: \$10,900:

Personnel (Inventory Development): 160 hours @ \$15.00 per hour = \$2,400

Contractual: Brownfields Inventory = \$8,500

**Task 5: Environmental Assessments**

Develop EPA-approved QAPP and SAPs. Complete 20 Eligibility Determinations and Phase I ESAs (8 Petroleum and 12 Hazardous) following ASTM E1527-13, 8 Phase II ESAs (3 Petroleum and 5 Hazardous), 6 asbestos surveys (Hazardous), and 5 ABCAs (2 Petroleum and 3 Hazardous). Enter data into ACRES. In-kind personnel costs - estimated \$12,500.

Cost Basis (Petroleum Products) – Total: \$87,300

Contractual: Quality Assurance Project Plan = \$2,000

Contractual: 8 Phase I ESAs @ \$3,600 per Phase I ESA (average) = \$28,800

Contractual: 3 Phase II ESAs @ \$16,500 per Phase II ESA (average) = \$49,500

Contractual: 2 ABCAs @ \$3,500 per ABCA = \$7,000

Cost Basis (Hazardous Substances) – Total: \$162,500

Contractual: Quality Assurance Project Plan = \$2,000

Contractual: 12 Phase I ESAs @ \$3,600 per Phase I ESA (average) = \$43,200

Contractual: 5 Phase II ESAs @ \$18,000 per Phase II ESA (average) = \$90,000

Contractual: 6 Asbestos Surveys @ \$2,800 per survey (average) = \$16,800

Contractual: 3 ABCAs @ \$3,500 per ABCA = \$10,500.

**ii. Budget Table**

PROJECT TASKS - PETROLEUM PRODUCTS BUDGET						
Budget Categories	Task 1: Program Management	Task 2: Community Engagement	Task 3: Health Monitoring	Task 4: Inventory	Task 5: Site Assessments	TOTAL
Personnel				\$2,400		\$2,400
Travel	\$5,000					\$5,000
Supplies		\$1,400				\$1,400
Contractual			\$7,000	\$8,500	\$87,300	\$102,800
Other		\$600				\$600
<b>Total Budget</b>	<b>\$5,000</b>	<b>\$2,000</b>	<b>\$7,000</b>	<b>\$10,900</b>	<b>\$87,300</b>	<b>\$112,200</b>
PROJECT TASKS - HAZARDOUS SUBSTANCES BUDGET						



Budget Categories	Task 1: Program Management	Task 2: Community Engagement	Task 3: Health Monitoring	Task 4: Inventory	Task 5: Site Assessments	TOTAL
Personnel				\$2,400		<b>\$2,400</b>
Travel	\$5,000					<b>\$5,000</b>
Supplies		\$1,800				<b>\$1,800</b>
Contractual			\$7,000	\$8,500	\$162,500	<b>\$178,000</b>
Other		\$600				<b>\$600</b>
<b>Total Budget</b>	<b>\$5,000</b>	<b>\$2,400</b>	<b>\$7,000</b>	<b>\$10,900</b>	<b>\$162,500</b>	<b>\$187,800</b>
<b>TOTAL REQUESTED FUNDING</b>						<b>\$300,000</b>

### C. ABILITY TO LEVERAGE

The City recognizes Brownfields grants are a catalyst for property redevelopment that stimulates economic, social, health, and environmental benefits to the community. Furthermore, the City realizes site assessments may not be sufficient to meet the end goals of the grant program, and we must leverage these funds with additional City resources. The City will leverage funds for transportation through \$1.6 million in capital improvement projects for streets planned in FY18. Douglas also can leverage \$7.4 million for sewer improvements funded through the Border Environment Corporation Commission and \$6.8 grant from USDA.

Within the next five years the eventual construction by the CBP for the new commercial POE will include an estimated investment of \$37.7 million that will lead to the annexation of an additional 7,000 acres. This will provide Douglas increased sales tax revenue to be leveraged in future years.

Douglas currently has funds available from a HUD Community Development Block Grant that could be used for redevelopment in affordable housing, social services, and community centers that are lacking in the project area. The ADEQ Leaking Underground Storage Tank (LUST) Pre-Approval Program is available to property owners which allows owners to receive up to \$1,000,000 reimbursement for LUST site cleanup for sites that meet the LUST Program criteria.

### 3. COMMUNITY ENGAGEMENT AND PARTNERSHIPS

#### A. ENGAGING THE COMMUNITY

##### i. Community Involvement Plan

It is the City's experience that seeking the community's input in the grant application process prior to the submittal of the grant greatly increases the success of the program after the funds are awarded. Accordingly, the City initiated the community engagement process for this grant application in December 2013 while the grant application was being developed. City public outreach efforts include the following:

The City will continue to be proactive in its partnership with the local community following the grant award to optimize the benefits provided by this grant for the entire community. The communication plan the City will include the following components:

- Distribution of a newsletter to the multiple neighborhood associations once the grant is awarded and provide updates on key project milestones
- Establish a Brownfield's Task Force consisting of neighborhood representatives, business leaders, property owners, developers, non-profit organizations, and the City
- Posting periodic project updates and relevant documentation on the City's website
- Holding public meetings at key project milestones
- Presenting project updates to stakeholder groups

The commercial real estate community, Douglas' Economic and Community Development office, neighborhood associations, as well as other interested associations and organizations, will receive periodic updates on all environmental projects within the Project Area. Douglas will solicit input for future activities and respond to questions, comments, and concerns. Subsequent meetings will be scheduled as the project progresses. At a minimum, the City will schedule meetings on a semi-annual basis. The City has a Webpage (<http://www.douglasaz.gov/>) that may be used for project updates, comments and questions. Because a significant portion of the community is Spanish-speaking, the City will provide information in both English and Spanish. Flyers and meeting announcements will be bilingual, and interpreters will be provided for meetings. City staff are bilingual and will be available to meet with Spanish-speaking residents.

## **ii. Community Progress**

The City has recruited active public participation from various sectors of the community, and have formed a strong consensus on how to successfully address the needs for economic development and job creation. Mr. Carranza has met with business leaders, real estate brokers, property owners who are actively engaged with advancing an economic development plan. Ongoing communication will be provided in both English and Spanish, and interpreters will be present at public meetings. Brownfields objectives will include:

- Meeting with stakeholders and community land owners
- Program materials will be distributed to encourage non-profit organizations, neighborhood associations, small-businesses, lenders, real estate and broker community
- Post Brownfields Program updates via the City website and social media
- Present project milestones to Mayor and Council and through public updates

## **B. PARTNERSHIPS WITH GOVERNMENT AGENCIES**

### **i. Local, State, and Tribal Environmental Authority**

The City partnered with Representative Martha McSally of the 2<sup>nd</sup> Congressional District of Arizona, and the CBP to apportion federal funding earmarked for a Feasibility Study to construct a new Douglas Commercial POE. The City is establishing ties with manufacturers within the Greater Douglas binational region, and are working on identifying existing gaps in manufacturing to develop a manufacturing and supply chain recruitment strategy. Douglas and ADOT are working on the Arizona-Mexico Corridors Study for the origin and destination travel corridors to understand the movement of products to/from Mexico and through the Douglas POE.<sup>20</sup>

Douglas has partnered with Southeastern Association of Governments, University of Arizona, and with government officials in Mexico who share common challenges and are forging ahead to develop strategies that will strengthen the economies for border communities.

## **ii. Other Relevant Government Partnerships**

Partnerships with the CBP, Homeland Security, Arizona of Department of Environmental Quality, Arizona Commerce Authority, and Mexican government officials are ongoing to achieve desired outcomes centered on regional economic development strategies. The City regularly contracts with the ADHS to provide health consultations for health advisories and studies regarding health risks associated with the effects of copper smelting and mining operations. The City will encourage land owners and businesses to utilize the ADEQ Voluntary Remediation Program (VRP), which allows property owners, and prospective purchasers to include ADEQ and follow appropriate regulations for assessment and cleanup activities.

## **C. PARTNERSHIPS WITH COMMUNITY ORGANZATIONS**

### **i. Community Organization Description and Roles**

The following organizations will serve in an advisory role for the project. Letters of support from these organizations are included in Appendix C.

<b>Organization</b>	<b>Description and Role</b>
<b>Arizona Public Service</b>	Provides power service to customers throughout Arizona, and supports economic growth. <u>Role:</u> Partners with municipalities and regional economic development organizations to assist with long-term economic sustainability.
<b>SouthEastern Association of Governments</b>	Is a 501(c)3, nonprofit and regional planning organization. <u>Role:</u> Stimulates economic and social progress for municipalities in Southern Arizona.
<b>Cochise College</b>	A fully accredited learning institution recognized by the Higher Learning Commission. <u>Role:</u> Provides college students with higher learning programs and school credits that are transferable to four-year universities.
<b>Cochise County Board of Supervisors</b>	A government body of elected officials that oversees local government business within Cochise County, AZ. <u>Role:</u> Provides regional leadership and effective, high quality services with personal and professional integrity for Cochise County residents.
<b>Partners for Strategic Action</b>	A community planning and design firm specializing in land use strategic planning, policy development, and governance consulting. <u>Role:</u> Provides award-winning sustainability strategies, smart growth plans, public engagement processes, and community visioning.

### **ii. Letters of Commitment**

Letters of commitment are presented in Attachment B.

#### **D. PARTNERSHIPS WITH WORKFORCE DEVELOPMENT PROGRAMS**

Arizona Works of Douglas is a non-profit group that promotes a workforce system offering employers and workers workforce solutions in Douglas. The Arizona Regional Economic Development Foundation also provides support for local business start-ups and low interest loans for small-business owners looking to expand their business and job growth.

#### **4. PROJECT BENEFITS**

##### **A. WELFARE, ENVIRONMENTAL, AND PUBLIC HEALTH BENEFITS**

Redevelopment on Brownfields sites will help to eliminate many of the conditions that have caused the Project Area to be classified as a slum, such as the presence of dilapidated, deteriorated, aging or obsolescent buildings. Improved welfare of Douglas will be promoted through the new designation of a region, which links Douglas with Sierra Vista to the northwest, as a developing metropolitan area that will stimulate subsequent growth. Three ways the new metropolitan area will grow: 1) newly designated area will be in better position to draw down federal funds, 2) metropolitan designation may enhance the level of economic information provided by federal and state statistical agencies for the region, and 3) the metropolitan designation may raise marketing profiles of the region, particularly with national or multi-state site selection searches.<sup>21</sup> Additionally, the proposed commercial POE to be completed within the next five years will help establish a new commercial corridor west of downtown Douglas.

Remediating contaminants such as volatile organic compounds (VOCs), semi-volatile organic compounds (SVOCs), polynuclear aromatic hydrocarbons (PAHs), polychlorinated biphenyls (PCBs), metals, and asbestos on Brownfields sites will minimize exposure of the targeted community, thereby reducing the risks of cancer and many other health risks associated with these contaminants. Brownfields site remediation will also reduce soil and groundwater pollution in the Project Area and the risk of vapor intrusion.

Plans to re-route the POE commercial traffic west of downtown will encourage residents and Mexican visitors to walk, bike and carpool to the Central Business District, which can decrease the use of automobiles, and help to reduce air pollution in the downtown area. The new designation as a metropolitan area will increase the leverage of federal funding for multi-modal transportation alternatives, and provide the community with multi-use pathways, which will allow residents to safely walk or bike to shopping, education and business centers. The City will be able to plan a pedestrian greenway that will provide a convenient place for residents of the low-income neighborhoods downtown to improve their quality of life through exercise.

##### **B. ECONOMIC AND COMMUNITY BENEFITS**

The City is implementing policies that support the restoration of downtown Douglas "G" Avenue Historic Downtown structures. The strategy is to develop and implement a comprehensive incentive, and tax plan to aid in the reinvestment and revitalization of Downtown Douglas. Douglas has implemented a Mixed-Use Overlay Zone and District to lift planning and code restrictions for downtown redevelopment.

Brownfields cleanup will create immediate and long-term job opportunities and allow Douglas to leverage other federal funding earmarked for the Project Area. Major investments in Mexico

and the U.S. continue to support the renewed understanding of the close link between infrastructure and economic development anchored in international trade that produced a total two-way trade of \$15.7 billion. The University of Arizona and Cochise College have partnered with the City for strong economic development by providing educational and business training programs that is aligned with community needs, and encourage young workers to choose employment in the Douglas metropolitan area. Private investments have been made in areas such as convenience store, CVS drug store and hotel (\$15,000,000), retail shops (\$5,000), office space (\$50,000), multi-family housing (\$1,000,000) and other areas that are helping to transform the downtown area. The redevelopment of Brownfields sites within the Project Area is expected to attract private investment into the area. The development of currently vacant and/or underutilized Brownfields properties will increase both the property and sales tax base for the City of Douglas. This increased revenue will allow the city to further support its citizens, especially those living in poverty, by providing vital government services and programs.

The city has implemented several incentive programs to enhance economic competitiveness in the Central Business District by attracting new businesses into the area. New businesses will provide employment opportunities for unemployed or underemployed individuals to develop new job skills and provide necessary resources to expand and/or attract new sustainable businesses. It will enhance the tax base of our community to allow for re-investment into local communities for services such as schools, health care, infrastructure, employment training, and recreational amenities. The City's downtown redevelopment plan also supports existing communities. Redevelopment in downtown Douglas is focused on International commerce-oriented and commercial/retail development in the Central Business District, and along the proposed commercial POE corridor. The goal of development in the Project Area is a mixed use, walkable community. Douglas is focused on recycling downtown commercial buildings and redeveloping existing infrastructure, while encouraging new business development in the area.

## **5. PROGRAMATIC CAPABILITY AND PAST PERFORMANCE**

### **A. Audit Findings**

The City of Douglas has not received any adverse audit findings. The City of Douglas is not, nor has previously been, required to comply with special "high risk" terms and conditions under agency regulations implementing OMB Circular A-102.

### **B. Programmatic Capability**

The City of Douglas's Economic and Community Development (ECD) Department will be responsible for managing this grant. This department has an annual budget of \$22,000 and is comprised of 2 community and economic development professionals, of whom all are dedicated to overseeing the City's Brownfields Program. The Division has a highly-qualified, person in charge, David Carranza, ECD Department Director, will be the Project Manager for the Community-wide Assessment grant. Mr. Carranza has 15 years of experience specializing in environmental due diligence, economic development, and agency coordination. Ms. Patti Beltran will provide technical and administrative support, and assure the grant terms and

conditions are met, including EPA reporting requirements. Other members of the ECD Department will provide administrative support during periods of high workloads.

Mr. Carranza has extensive grant management experience including Community-Wide Assessment, Site Specific Assessment. He and his staff are familiar with the terms and conditions of the Cooperative Agreements that govern federal grants and have instituted proven programs to assure compliance. These include:

- Timely submittal of Quarterly Reports and Property Profiles upon project completion
- Site-specific Eligibility Determination checklist submitted to either ADEQ or EPA to ensure that only properties that meet CERCLA eligibility criteria are assessed.
- Property Access Agreements that expedite site access to complete assessments.

### **C. MEASURING ENVIRONMENTAL RESULTS: ANTICIPATED OUTPUTS/OUTCOMES**

Outputs to be accomplished with this grant are listed in Section 2(b)(i). The City will prepare a Work Plan with quantitative goals and a schedule. Project outputs, outcomes, and results will be measured against Work Plan commitments, documented in the Quarterly Report and final reports, and updated in ACRES quarterly.

### **D. PAST PERFORMANCE AND ACCOMPLISHMENTS**

#### **i. Currently or Has Ever Received an EPA Brownfields Grant**

The City of Douglas has not ever received an EPA Brownfields Grant.

#### **1. Purpose and Accomplishments**

Douglas has received a CDBG (\$1.1 million) and Section 8 Housing Choice (\$756,569) grants for suitable housing and community development allocated for low income residents. The City has also received \$7.48 million from the Border Environment Cooperation Commission (2017) and \$6.88 million from USDA for wastewater treatment system expansion and development.

#### **2. Compliance with Grant Requirements**

The City has always been in full compliance with the terms and conditions of Cooperative Agreements, including compliance with Federal guidelines, accomplishment and expenditures reports, performance profiles, consolidated and annual action plans. Douglas has achieved the expected outcomes outlined in the work plan for HUD, Section Housing Choice Voucher and CDBG programs. Annual technical progress and financial reports that describe performance objectives and major accomplishments are timely submitted for the USDA grant. A work plan and feasibility study has been completed for the design and construction of wastewater treatment plant improvements for the Border Environment Cooperation Commission grant.

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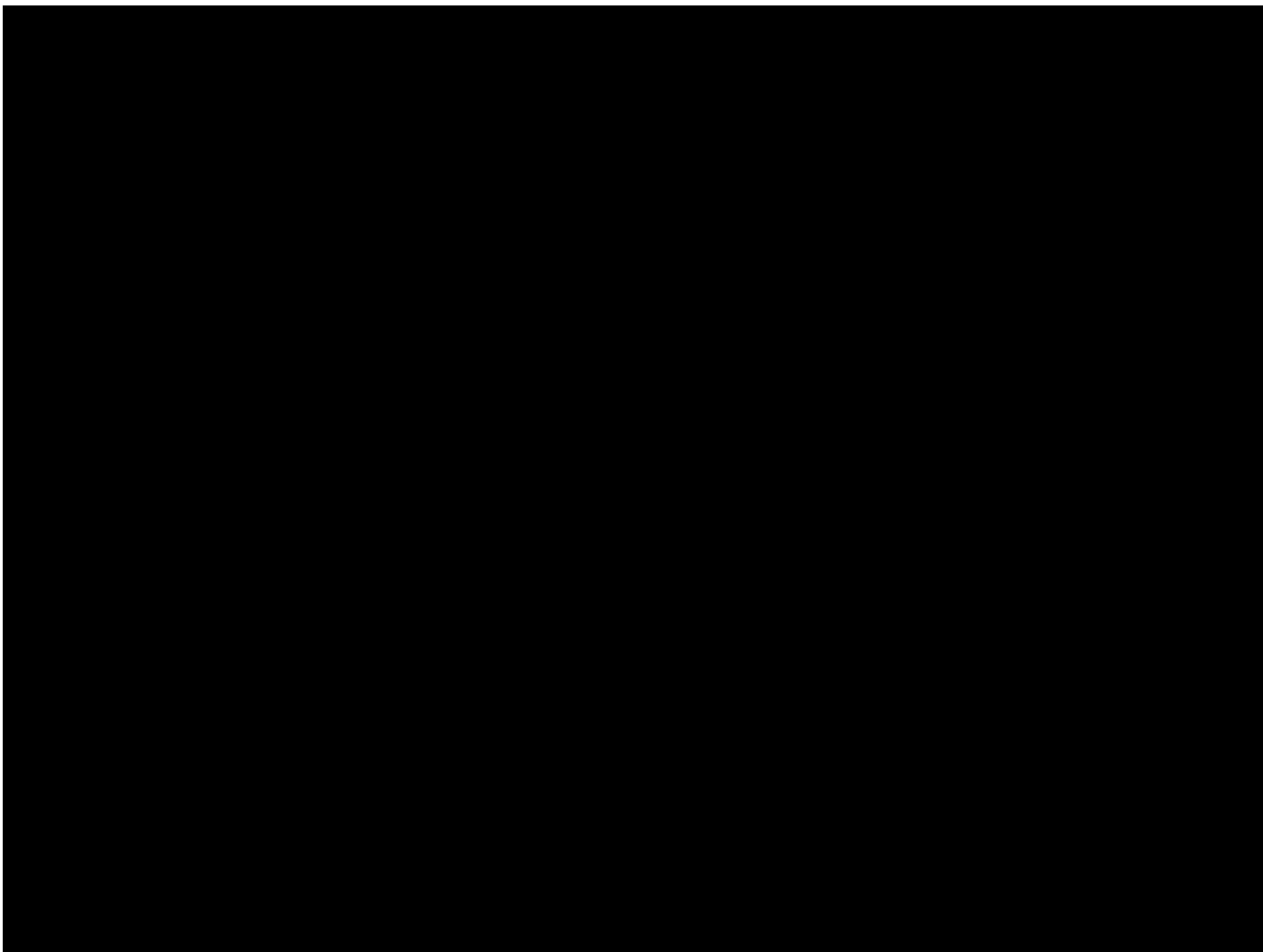
<sup>1</sup> Data is from the U.S. Census Bureau: State and County QuickFacts, Douglas, Arizona, available at [http://www.bls.gov/eag/eag.az\\_Douglas\\_msa.htm](http://www.bls.gov/eag/eag.az_Douglas_msa.htm) [http://www.bls.gov/eag/eag.az\\_Douglas\\_msa.htm](http://www.bls.gov/eag/eag.az_Douglas_msa.htm)

<sup>2</sup> City of Douglas, Economic Outlook 2017, Cochise College.

<sup>3</sup> City of Douglas, Findings of Conditions Leading to Arrested Growth in the Proposed Downtown/Gateway Redevelopment Area, March 2012. <http://cms3.Douglasaz.gov/business/cbd>

<sup>4</sup> Arizona Department of Environmental Quality, Underground Storage Tank, available at [http://legacy.azdeq.gov/databases/ustsearch\\_drupal.html](http://legacy.azdeq.gov/databases/ustsearch_drupal.html)

<sup>5</sup> EJSCREEN, ACS Summary Report, available at <https://ejscreen.epa.gov/mapper/demogreportpdf.aspx?report=acs2015>







## Cochise County Board of Supervisors

Public Programs—Personal Service  
[www.cochise.az.gov](http://www.cochise.az.gov)

**ANN ENGLISH**  
Chairman  
District 2

**EDWARD T. GILLIGAN**  
County Administrator

**PATRICK G. CALL**  
Vice-Chairman  
Board District 1

**ARLETHE G. RIOS**  
Clerk of the

**PEGGY JUDD**  
Supervisor  
District 3

November 8, 2017

Jim Russel  
City Manager  
City of Douglas  
425 10<sup>th</sup> St.  
Douglas, AZ. 85607

Re: City of Douglas Brownfields Community Wide Assessment Grant

Dear Mr. Russell,

Cochise County strongly supports the City of Douglas and their efforts to revitalize the Downtown Business District and other targeted areas of the business community. Assessing the needs will certainly help understand the viability of retaining, remodeling or removing structures that were built many years ago and have not aged gracefully.

The economy of the Douglas area is depressed and investors need to know the problems that would need to be overcome before committing to the area. This Assessment Grant would set up a framework for the possibility of private funding to stimulate the economy.

We support their vision and efforts to revitalize Downtown Douglas and we have shown it by spending several million dollars to renovate and modernize the old Phelps Dodge Mercantile/Headquarters into the Cochise County Service Center, Douglas. It is our hope the assessment will show other efforts that would be financially feasible.

Sincerely,

Ann English  
Cochise County  
Board of Supervisors, Chair

1415 Melody Lane, Building G  
Bisbee, Arizona 85603  
520-432-9200  
520-432-5016 fax  
[board@cochise.az.gov](mailto:board@cochise.az.gov)





November 9, 2017

Jim Russell  
City Manager  
The City of Douglas  
425 East 10th Street  
Douglas, AZ 85607

Re: Letter of Commitment for City of Douglas, Arizona  
2018 Brownfields Community-Wide Assessment Grant

Dear Mr. Russell:

Arizona Public Service is pleased to provide this Letter of Commitment to the City of Douglas for its Community-Wide Assessment Grant application to the Environmental Protection Agency (EPA) for the Fiscal Year 2018. We strongly support the City of Douglas and their efforts to revitalize the Downtown Business District, and other targeted areas of the business community. We know there is much work to do and we are confident that EPA will understand the importance of the Brownfields program to the City of Douglas.

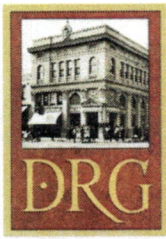
Arizona Public Service fully supports the vision our community leaders to revitalize depressed areas the Douglas economy. We are hopeful that the City of Douglas will submit a successful grant proposal. We thank you for the opportunity to show our support for this grant.

Should you have any questions, please contact me at your convenience.

Sincerely,

A handwritten signature in blue ink, appearing to read "David Bentler", with a long horizontal flourish extending to the right.

David Bentler  
Manager, Statewide Community & Economic Development  
Arizona Public Service



DOUGLAS  
REALTY  
GROUP

**Michael Gutierrez, Broker**  
620 E 10<sup>th</sup> Street Douglas, AZ 85607  
Office: 520-364-2437  
Fax: 520-364-3010  
Mobile: 520-678-6299

Mike.drg1@gmail.com

November 6, 2017

Jim Russel, City Manager  
City of Douglas  
425 10<sup>th</sup> St  
Douglas, AZ 85607

Re: Letter of Commitment for City of Douglas, Arizona  
2018 Brownfields Community-Wide Assessment Grant

Dear Mr. Russel:

Douglas Realty Group is pleased to provide this Letter of Commitment to the City of Douglas for its Community-Wide Assessment Grant application to the Environmental Protection Agency (EPA) for the Fiscal Year 2018. Our home town of Douglas has been greatly impacted by the lack of jobs and the closing of small businesses that were once anchors in the Douglas community. Our population has stagnated and struggled to bring new businesses for job growth. Most of the vehicle and pedestrian traffic entering the Douglas Port of Entry bypasses the downtown area because of newer restaurants and retail stores west of downtown Douglas. Our city and elected officials have a vision to bring new life to our historical, and cultural underpinnings. We are in full support of this vision.

Several environmental impacts must be addressed with our existing commercial building stock to stimulate interest in revitalizing the Downtown Business District. We strongly support the City of Douglas and their efforts to revitalize the Downtown Business District, and other targeted areas of the business community.

Douglas Realty Group shares the vision of our local leaders to reinvigorate depressed areas of Douglas and is hopeful that the City of Douglas will submit a successful grant proposal. Thank you for the opportunity to show our support for this grant.

Should you have any questions, please do not hesitate to contact me anytime.

Sincerely,

Michael Gutierrez,  
Designated Broker



**COCHISE COLLEGE**

OFFICE OF THE  
PRESIDENT

November 7, 2017

Jim Russell  
City Manager  
City of Douglas  
425 East 10<sup>th</sup> Street  
Douglas, AZ 85607

Re: Letter of Commitment for City of Douglas, Arizona  
2018 Brownfields Community-Wide Assessment Grant

Dear Mr. Russell:

Cochise Community College District is pleased to provide this Letter of Commitment to the City of Douglas for its Community-Wide Assessment Grant application to the Environmental Protection Agency (EPA) for the Fiscal Year 2018. The City of Douglas economy has been greatly impacted by the lack of jobs and re-establishing small business that were once anchors in the Douglas community. Our population has stagnated and struggled to bring new businesses for job growth. Most of the vehicle and pedestrian traffic entering the Douglas Port of Entry bypasses the downtown area because of newer restaurants and retail stores west of downtown Douglas. The City of Douglas and elected officials have a vision to bring new life to our historical, and cultural underpinnings. We are in full support of this vision.

Several environmental impacts must be addressed with our existing commercial building stock to stimulate interest in revitalizing the Downtown Business District. We strongly support the City of Douglas and their efforts to revitalize the Downtown Business District, and other targeted areas of the business community.

Cochise College fully supports the vision our community leaders to revitalize depressed areas the Douglas economy. We are hopeful that the City of Douglas will submit a successful grant proposal. We thank you for the opportunity to show our support for this grant.

Should you have any questions, please contact me at your convenience.

J.D. Rottweiler, Ph.D.  
College President

Sincerely,

A handwritten signature in blue ink, appearing to read "J.D. Rottweiler", written over a light blue background.



## SouthEastern Arizona Governments Organization

*Serving our member governments and their constituents since 1972*

November 7, 2017

### SEAGO

#### Member Entities

##### *Cochise County*

*Benson*

*Bisbee*

*Douglas*

*Huachuca*

*City Sierra*

*Vista*

*Tombstone*

*Willcox*

##### *Graham County*

*Pima*

*Safford*

*San Carlos*

*Apache Tribe*

*Thatcher*

##### *Greenlee County*

*Clifton*

*Duncan*

##### *Santa Cruz County*

*Nogales*

*Patagonia*

Jim Russell  
City Manager  
City of Douglas  
425 E. 10<sup>th</sup> Street  
Douglas, Arizona 85607

Re: Letter of Support for the City of Douglas Application for the a  
2018 Brownfields Community-Wide Assessment Grant

Dear Mr. Russell:

The SouthEast Arizona Governments Organization (SEAGO) is an Economic Development Administration (EDA) recognized Economic Development District (EDD), and is part of EDA Region VI. Our Comprehensive Economic Development Strategy covers the four Arizona counties of Cochise, Graham, Greenlee, and Santa Cruz. SEAGO's mission is, "to provide leadership, information, resources, and services that promote communication, cooperation, and collaboration among federal, state, and regional entities and enhance economic and social progress for all individuals in our four-county region."

SEAGO would like to take this opportunity to express its strong support for the City of Douglas' application for an Environmental Protection Agency (EPA) Community-Wide Assessment Grant for the Fiscal Year 2018. As you are undoubtedly aware, the City of Douglas economy has been greatly impacted by the lack of jobs and the decline in small businesses that were once anchors in the Douglas community. As a result of the closing of mine operations in the Douglas area, and the more recent effects of the national recession, the Douglas population has stagnated, many businesses have closed, and the community has struggled to attract new businesses or encourage "start-up" businesses. Currently, most of the vehicle and pedestrian traffic entering the Douglas Port of Entry completely bypasses the downtown area, further exacerbating the downtown deterioration. The City of Douglas has actively developed a vision to bring new life to its historical, and cultural underpinnings, and SEAGO is in full support of that vision.

Several environmental impacts must be addressed with the City's existing commercial building stock to stimulate interest in revitalizing the Downtown Business District, and SEAGO strongly supports, and will assist, the City of Douglas and their efforts to revitalize the Downtown Business District, and other targeted areas of the business community. So SEAGO again expresses its support for the City of Douglas' application for an Environmental Protection Agency (EPA) Community-Wide Assessment Grant for the Fiscal Year 2018.

#### SEAGO Main Office

##### **Administration** **CDBG** **Economic Dev.** **Housing** **Transportation**

1403 W. Hwy 92,  
Bisbee, AZ 85603  
520-432-5301  
520-432-5858 Fax

#### **Area Agency on Aging Office**

300 Collins Road  
Bisbee, AZ 85603  
520-432-2528  
520-432-  
[www.seago.org](http://www.seago.org)

Should you have any questions, please contact me at your convenience; email [lcatten@seago.org](mailto:lcatten@seago.org), phone 520.432.2622.

Best Regards,

Larry Catten

A handwritten signature in black ink, appearing to read 'L. Catten', with a long horizontal stroke extending to the right.

Economic Development Planner  
SouthEastern Arizona Governments Organization  
1403 West Highway 92  
Bisbee, AZ 85603





November 8, 2017

Jim Russell  
City Manager  
City of Douglas  
425 10<sup>th</sup> St  
Douglas, AZ 85607

Re: Letter of Commitment for City of Douglas, Arizona  
2018 Brownfields Community-Wide Assessment Grant

Dear Mr. Russell:

Partners for Strategic Action, Inc. has been working with the City of Douglas on economic development for the past few years. The community is making great strides to strengthen and diversify its regional economy and build a strong community base. PSA, Inc. is pleased to provide this Letter of Commitment to the City of Douglas for its Community-Wide Assessment Grant application to the Environmental Protection Agency (EPA) for the Fiscal Year 2018. We strongly support the City of Douglas and their efforts to revitalize the Downtown Business District, and other targeted areas of the business community. We know there is much work to do and we are confident that EPA will understand the importance of the Brownfields program to the City of Douglas.

PSA, Inc. fully supports the vision our community leaders to revitalize depressed areas the Douglas economy. We are hopeful that the City of Douglas will submit a successful grant proposal. We thank you for the opportunity to show our support for this grant.

Should you have any questions, please contact the undersigned at your convenience.

Sincerely,

Peggy Fiandaca, AICP  
President

## **THRESHOLD CRITERIA**

### **1. Applicant Eligibility**

The City of Douglas is a General Purpose Unit of Local Government as defined under 40 CFR Part 31.

### **2. Community Involvement**

Douglas has created a plan in order to involve the community and other stakeholders during the planning, implementation and other assessment activities for this grant project. Douglas's community involvement plan can be found in Section 3 of the attached proposal and letters of support from community partners are also attached.

### **3. Site Eligibility and Property Ownership Eligibility**

This grant application is for Community-Wide Assessment, not Site-Specific Assessment. Therefore, this criterion is not applicable to this application.

## Application for Federal Assistance SF-424

\* 1. Type of Submission:

- ☐ Preapplication  
☒ Application  
☐ Changed/Corrected Application

\* 2. Type of Application:

- ☒ New  
☐ Continuation  
☐ Revision

\* If Revision, select appropriate letter(s):

\* Other (Specify):

\* 3. Date Received:

11/16/2017

4. Applicant Identifier:

5a. Federal Entity Identifier:

5b. Federal Award Identifier:

State Use Only:

6. Date Received by State:

7. State Application Identifier:

8. APPLICANT INFORMATION:

\* a. Legal Name:

City of Douglas

\* b. Employer/Taxpayer Identification Number (EIN/TIN):

866000241

\* c. Organizational DUNS:

6150021150000

d. Address:

\* Street1:

425 E. 10th Street

Street2:

\* City:

Douglas

County/Parish:

\* State:

AZ: Arizona

Province:

\* Country:

USA: UNITED STATES

\* Zip / Postal Code:

85607-2008

e. Organizational Unit:

Department Name:

Division Name:

f. Name and contact information of person to be contacted on matters involving this application:

Prefix:

Mr.

\* First Name:

David

Middle Name:

\* Last Name:

Carranza

Suffix:

Title:

Community and Economic Development Director

Organizational Affiliation:

City of Douglas

\* Telephone Number:

520-417-7307

Fax Number:

520-417-7143

\* Email:

david.carranza@douglasaz.gov



## Application for Federal Assistance SF-424

### \* 9. Type of Applicant 1: Select Applicant Type:

C: City or Township Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

\* Other (specify):

### \* 10. Name of Federal Agency:

Environmental Protection Agency

### 11. Catalog of Federal Domestic Assistance Number:

66.818

CFDA Title:

Brownfields Assessment and Cleanup Cooperative Agreements

### \* 12. Funding Opportunity Number:

EPA-OLEM-OBLR-17-07

\* Title:

FY18 GUIDELINES FOR BROWNFIELDS ASSESSMENT GRANTS

### 13. Competition Identification Number:

Title:

### 14. Areas Affected by Project (Cities, Counties, States, etc.):

Add Attachment

Delete Attachment

View Attachment

### \* 15. Descriptive Title of Applicant's Project:

Central Business District Revitalization

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

**Application for Federal Assistance SF-424****16. Congressional Districts Of:**\* a. Applicant \* b. Program/Project 

Attach an additional list of Program/Project Congressional Districts if needed.

Add Attachment

Delete Attachment

View Attachment

**17. Proposed Project:**\* a. Start Date: \* b. End Date: **18. Estimated Funding (\$):**

* a. Federal	<input type="text" value="300,000.00"/>
* b. Applicant	<input type="text" value="0.00"/>
* c. State	<input type="text" value="0.00"/>
* d. Local	<input type="text" value="0.00"/>
* e. Other	<input type="text" value="0.00"/>
* f. Program Income	<input type="text" value="0.00"/>
* g. TOTAL	<input type="text" value="300,000.00"/>

**\* 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**

- ☐ a. This application was made available to the State under the Executive Order 12372 Process for review on .
- ☐ b. Program is subject to E.O. 12372 but has not been selected by the State for review.
- ☒ c. Program is not covered by E.O. 12372.

**\* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**☐ Yes ☒ No

If "Yes", provide explanation and attach

Add Attachment

Delete Attachment

View Attachment

**21. \*By signing this application, I certify (1) to the statements contained in the list of certifications\*\* and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances\*\* and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)**

☒ \*\* I AGREE

\*\* The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

**Authorized Representative:**

Prefix:  \* First Name:

Middle Name:

\* Last Name:

Suffix:

\* Title: \* Telephone Number:  Fax Number: \* Email: \* Signature of Authorized Representative:  \* Date Signed: